

## **REMARKS**

In response to the above-identified Office Action, Claims 1, 5, 14 and 17 are amended, Claims 3, 7, 16 and 18 are cancelled and no claims. Claims 1-7, 14, 29, 31, 35-37, 39-41, 43 and 44 were examined. Claims 1-7 and 14-19 stand rejected. Claims 29, 31-33, 35-37, 39-41, 43 and 44 are allowed. Claims 23-28, 30, 34, 38 and 42 were withdrawn from consideration and Claims 8-13 and 20-22 were previously cancelled. Applicants reserve the right to prosecute the former claims in a divisional or continuation application. Applicants respectfully request reconsideration of pending Claims 1-7 and 14-19, as amended, in view of at least the following remarks.

### **I. Information Disclosure Statement**

The Examiner has rejected the Information Disclosure Statement filed on October 31, 2000 for failure to comply with the provisions of 37 CFR §§1.97 and 1.98 and MPEP §609 for failure to show the title of the book or the publisher data. Applicants submit herewith a re-submission of their IDS, along with the requisite fee of \$180.00 in accordance with 37 CFR §1.17(p) and in compliance with provisions of 37 CFR §§1.97 and 1.98 and MPEP §609.

### **II. Claims Rejected Under 35 U.S.C. §102**

The Patent Office rejects Claims 1, 2, 5, 6, 14 and 16 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,326,984 B1 issued to Chow, et al. ("Chow"). Applicants respectfully traverse this rejection.

Applicants respectfully assert that the Examiner has failed to adequately set forth a *prima facie* rejection under 35 U.S.C. §102(b). "Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, *arranged as in the claim*." Lindemann Maschinenfabrik v. American Hoist & Derrick ("Lindemann"), 730 F.2d 452, 1458 (Fed. Cir. 1994)(emphasis added). Additionally, each and every element of the claim must be exactly disclosed in the anticipatory reference. Titanium Metals Corp. of American v. Banner ("Banner Titanium"), 778 F.2d 775, 777 (Fed. Cir. 1985).

Regarding Claims 1, 5, 14 and 17, Claims 1, 5, 14 and 17 have been amended to incorporate the features of corresponding dependent Claims 3, 7, 16 and 18, namely:

motion compensating the plurality of color components in the mixed format of planar format and packed format. (Emphasis added.)

As correctly noted by the Examiner, motion compensation of color component in the mixed storage format is not taught by Chow. Accordingly, in the Examiner's rejection of Claims 3 and 16 under 35 U.S.C. §103(a), the Examiner cites Herrara. According to the Examiner, Herrara discloses motion compensating the plurality of color components in the mixed format (See col. 3,

lines 3-19; col. 5, lines 45-64; col. 9, lines 55-60; col. 10, lines 5-10; col. 10, lines 21-27).

Applicants respectfully disagree with the Examiner's contention.

Specifically, after carefully reviewing the passages cited by the Examiner, as well as the entire text of Herrera, Applicants respectfully submit that Herrera teaches:

offloading the motion compensation 28 and planar YUV 4:2:0-to-4:2:2 conversion 30 processes to the modified graphics accelerator 84 . . . [to] . . . achieve the ultimate goal of 60 fields/sec (30 fps) playback performance on a 266 MHz Pentium II™ platform. (See col. 9, lines 55-60.)

In other words, Herrera teaches a graphics accelerator 54, as illustrated in FIG. 4 to perform motion compensation, YUV 4:2:0 to 4:2:2 conversion and alpha blending to be performed within silicon in order to provide a simple robust and cost-effective implementation. (See col. 10, lines 5-9.) Hence, motion compensation, as taught by Herrera, is performed independent of the YUV 4:2:0-to-4:2:2 conversion. Consequently, Applicants respectfully submit that Herrera fails to teach or suggest motion compensating the plurality of color components in the mixed format, as required by Claims 1, 5, 14 and 17.

Furthermore, Herrera does not teach a mixed format of planar format and packed format, as required by Claims 1, 5, 14 and 17. As is depicted with reference to FIGS. 2A and 2B of Applicants' invention, in YUV 4:2:0 color space format, chrominance component matrices 122 and 124 may be one-half size of Y matrix 120 in horizontal and vertical directions, as depicted in FIG. 2A. In YUV 4:2:2 format, chrominance component matrices 132 and 134 may be one-half in size of Y matrix 130 in the horizontal directions and in the same size and the vertical direction, as depicted in FIG. 2B. (See, also, col. 15, lines 57-61.)

Hence, Applicants respectfully submit that a conversion from YUV 4:2:0 format to YUV 4:2:2 format would not result in a mixed format of planar format and packed format. Nevertheless, as described above, even assuming that Hererra taught the mixed storage format, as required by Claims 1, 5, 14 and 17, Herrera does not teach motion compensation of color components in the YUV 4:2:2 format. Applicants respectfully submit that Herrera teaches a hardware-implemented graphics accelerator, which is configured to perform YUV 4:2:0 to 4:2:2 conversion as well as motion compensation and alpha blending. Hence, the motion compensation is not performed on color components stored in the YUV 4:2:2 format as taught by Herrera.

Accordingly, Applicants respectfully submit that the Examiner is prohibited from establishing a *prima facie* case of anticipation of Claims 1, 5, 14 and 17, based on Chow. Furthermore, Applicants amendment of Claims 1, 5, 14 and 17 to include motion compensating of the plurality of color components in the mixed storage format prohibits the Examiner from establishing a *prima facie* case of obviousness of Claims 1, 5, 14 and 17 over Chow in view of Herrera.

Therefore, Applicants respectfully submit that Claims 1, 5, 14 and 17 are patentable over Chow, Herrera and the references of record, whether viewed independently or in combination. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 1, 5, 14 and 17.

Regarding Claim 2, Claim 2 depends from Claim 1 and therefore includes the patentable claim features of Claim 1, as described above. Accordingly, Claim 2, based on its dependency from Claim 1, and for at least the reasons described above, is also patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claim 2.

Regarding Claim 6, Claim 6 depends from Claim 5, and therefore includes the patentable claim features of Claim 5, as described above. Accordingly, Claim 6, based on its dependency from Claim 5, and for at least the reasons described above, is also patentable over the references of record.

Regarding Claim 15, Claim 15 depends from Claim 14, and therefore includes the patentable claim features of Claim 14, as described above. Accordingly, Claim 15, based on its dependency from Claim 14, and for at least the reasons described above, is also patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claim 15.

### **III. Claims Rejected Under 35 U.S.C. §103**

The Patent Office rejects Claims 3, 7, 16 and 18 under 35 U.S.C. §103(a) as being unpatentable over Chow in view of U.S. Patent No. 6,208,350 issued to Herrera ("Herrera"). Applicants respectfully traverse this rejection.

Regarding Claims 3, 7, 16 and 18, Claims 3, 7, 16 and 18 are cancelled in order to incorporate such claims within their corresponding independent claims; namely, Claims 1, 5, 14 and 17. Accordingly, the Examiner's rejection of the aforementioned claims is now moot based on Applicants' cancellation and incorporation of the subject matter of the aforementioned claims into their corresponding independent claims.

The Patent Office rejects Claims 4 and 19 under 35 U.S.C. §103(a) as being unpatentable over Chow in view of U.S. Patent No. 6,07,690 issued to Yamada et al. ("Yamada"). Applicants respectfully traverse this rejection.

Regarding Claim 4, Claim 4 depends from Claim 1, and therefore includes the patentable features of Claim 1, as described above. Regarding the Examiner's citing of Yamada, Yamada fails to rectify the deficiencies attributed to Chow in failing to teach or suggest motion compensating the plurality of color components in the mixed storage format of planar format and packed format. Consequently, Claim 4, based on its dependency from Claim 1, and for at least the

reasons described, is patentable over Chow, Yamada and the references of record, whether viewed in combination or independently. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §103(a) rejection of Claim 4.

Regarding Claim 19, Claim 19 depends from Claim 17, and therefore includes the patentable claim features of Claim 17, as described above. Regarding the Examiner's citing of Yamada, Yamada fails to rectify the deficiencies attributed to Chow in failing to teach or suggest motion compensation of color components in the mixed storage format, as required by Claim 17. Consequently, Applicants respectfully submit that Claim 19, based on its dependency from Claim 17, and for at least the reasons described above, is also patentable over Chow, Yamada and the references of record.

Regarding Applicants amendments to Claims 1, 5, 14 and 17, Applicants respectfully submit that such amendments are necessitated in order to place the aforementioned claims in condition for allowance, and therefore do not present any new issues since the subject matter of the claims is incorporated from corresponding dependent claims of the aforementioned independent claims. Accordingly, Applicants' amendments to Claims 1, 5, 14 and 17 are properly entered in response to the Final Office Action mailed September 25, 2003.

### CONCLUSION

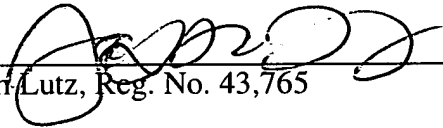
In view of the foregoing, it is submitted that Claims 1, 2, 4-6, 14, 15, 17, 19, 29, 31-33, 35-37, 39-41 and 43-44 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR, & ZAFMAN LLP

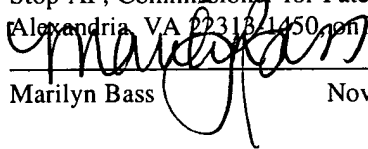
Dated: November 19, 2003

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#### **CERTIFICATE OF MAILING:**

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on November 19, 2003

  
Marilyn Bass

November 19, 2003